



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 01 2017

REPLY TO THE ATTENTION OF:

AT-18J

Ms. Gail Good  
Director, Bureau of Air Management  
Wisconsin Department of Natural Resources  
P.O. Box 7921  
Madison, Wisconsin 53707-7921

Dear Ms. Good:

The U.S. Environmental Protection Agency reviewed the Wisconsin Department of Natural Resources' 2018 Annual Air Monitoring Network Plan (ANP) and approves the plan and the proposed changes to your network of air quality monitors. Among the approved changes is the optimization of the PM<sub>2.5</sub> monitoring network through replacement of several PM<sub>2.5</sub> Federal Reference Method (FRM) samplers with Federal Equivalent Method (FEM) continuous Beta Attenuation Monitors (BAMs) and reduced sampling frequency at several FRMs across the state as presented in the plan and separate correspondence to EPA dated April 26, 2017.

EPA evaluated the plan and PM<sub>2.5</sub> network optimization, along with data and information about monitoring sites submitted to the Air Quality System database, and confirmed that your network meets the operational requirements of 40 CFR Part 58.

We acknowledge and approve the following specific modifications included in WDNR's annual network plan and PM<sub>2.5</sub> network optimization:

- PM<sub>2.5</sub> Network Method Change

WDNR proposed to implement a method change for several PM<sub>2.5</sub> monitoring sites in the state by changing the primary monitoring method at 8 PM<sub>2.5</sub> monitoring sites (Appleton, Chiwaukee Prairie, Harrington Beach, Milwaukee College Ave. Park & Ride, Perkinstown, Potawatomi, Potosi and Trout Lake) to BAM. EPA recently approved this method and primary monitor change at the Potosi site in a letter dated March 7, 2017. After the BAMs are designated as primary monitors for each site in the Air Quality System, they become the monitor providing the PM<sub>2.5</sub> design value for each monitoring site. FRMs will be discontinued at all these sites with the exception of Milwaukee College Ave. Park & Ride where a FRM will continue to operate in order to meet collocation requirements. With these changes, Wisconsin will operate 8 FEM primary monitors and 12 FRM primary monitors. Collocation requirements will be met as follows: 1 FRM/FEM: College Avenue Park and Ride (55-079-0058); 1 FEM/FEM: Devil's Lake (55-111-0007); 2 FRM/FRM: Milwaukee DNR SER (55-079-0026) and Green Bay East (55-009-0005).

- PM<sub>2.5</sub> FRM Reduced Sampling

WDNR proposed to reduce sampling frequency at five FRM monitors from 1 in 3 days to 1 in 6 days: Green Bay (55-009-0005), Horicon (55-027-0001), La Crosse (55-063-0012), Madison University Avenue (55-025-0047) and Waukesha Cleveland Avenue (55-133-027). FRM is, and will continue to be, the primary sampling method at all 5 of these sites, along with an FEM BAM collocated at each. All 5 monitors meet the criteria in 40 CFR Part 58.12(d)(1)(ii) for approval of a waiver to reduce sampling frequency to 1 in 6 days without compromising the data needed to implement the PM<sub>2.5</sub> NAAQS. Data at sites with collocated samplers will be processed in accordance with 40 CFR Part 50, Appendix N, Section 3(d) which requires that data from the designated primary monitor will be used for comparison the PM<sub>2.5</sub> NAAQS unless there are missing/invalid daily values. In this case, values from a collocated FRM or FEM monitor will be used, if available.

- Relocation of PM<sub>2.5</sub> Monitor at Trout Lake (55-125-0001)

WDNR proposed to move the Trout Lake monitor several yards farther from a tree line which would improve siting.

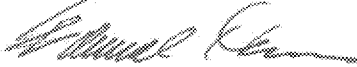
- Enhanced Monitoring Plan for Ozone

On December 19, 2016, Sheboygan County, Wisconsin was bumped-up to moderate non-attainment for ozone. As such, WDNR is required to develop and implement an Enhanced Monitoring Plan (EMP) in accordance with the revised Photochemical Assessment Monitoring Stations (PAMS) monitoring requirements promulgated on October 16, 2015 (40 CFR Part 58, Appendix D, Section 5). An EMP must be submitted to the Regional Administrator no later than October 1, 2019 or two years following the effective date of a designation classification of Moderate or above for ozone nonattainment; for Sheboygan County, that is December 19, 2018. Therefore, an EMP for Sheboygan should be included in Wisconsin's 2019 ANP (40 CFR 58.10). Elements of an EMP are outlined in 40 CFR part 58, Appendix D, Section 5(h). In addition, draft guidance (*Guidance for 1) Photochemical Assessment Monitoring Stations (PAMS) Required Network Implementation Plans (and waivers), and 2) Enhanced Monitoring Plans (EMPs)*) which is available to PAMS workgroup members through Sharepoint including WDNR, been developed and provides templates, for consideration, to develop and implement EMPs.

If you determine that changes to your monitoring network are needed due to unplanned circumstances or revisions to the federal ambient monitoring and quality assurance requirements, the modifications must be reviewed and approved by EPA.

EPA appreciates your partnership in conducting ambient air monitoring. We look forward to working with you to continuously improve the quality of ambient air in Wisconsin. If you have any questions or comments regarding this network review, please contact Michael Compber, Air Monitoring and Analysis Section Chief, at (312) 886-5745.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward Nam", written in a cursive style.

Edward Nam  
Director  
Air and Radiation Division